

EXHIBIT A

Moshe Boroosan

From: Moshe Boroosan
Sent: Wednesday, April 20, 2022 9:24 AM
To: Jeremy Doberman
Cc: Isaac Diskind; Abraham Kleinman v. Chaim Porges
Subject: Re: [Kleinman v. Roc Capital Holdings LLC, 22-03566]

Mr. Doberman:

Chag sameach. I am somewhat perplexed by your statement that this case has just come to your attention. During the April 11, 2022 hearing on Mr. Porges' order to show cause, you represented to the court that you were aware of those case and were familiar with its allegations, including the jurisdictional allegations.

I am even more perplexed by the fact that you waited an additional nine days, until the day before your answer was due, to seek an extension, especially since you knew you would be traveling abroad. It was also inappropriate to leave your files when you knew about the impending deadline.

Nevertheless, I am authorized to give you until April 27, 2022 to respond to the complaint. To the extent you intend to seek additional time, Plaintiff opposes that request.

This is becoming a pattern with your client. We will grant you a courtesy this one time but will not tolerate this gamesmanship moving forward. I expect you to either comply with existing deadlines or confer with us sufficiently in advance so we can consider and respond to any adjournment request.

Sincerely,
Moshe

Sent from my Verizon, Samsung Galaxy smartphone

From: Jeremy Doberman <jeremyd@marcwlaw.com>
Sent: Wednesday, April 20, 2022 3:49:07 AM
To: Moshe Boroosan <moshe@boroosanlaw.com>
Cc: Isaac Diskind <isaacd@marcwlaw.com>
Subject: [Kleinman v. Roc Capital Holdings LLC, 22-03566]

Mr. Boroosan,

It has come to my attention that you have commenced a case in the SDNY bearing the above-caption and case number. I am presently traveling abroad without access my files in New York. Would you kindly consent to a 30-day extension of time to answer as a courtesy?

Sincerely,

Jeremy Doberman

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